

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

SALZGITTER MANNESMANN)	
INTERNATIONAL (USA) INC.,)	
)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 2:07cv764-MHT
)	
SOUTHEASTERN STUD &)	
COMPONENTS, INC.,)	
)	
)	
Defendant.)	

PLAINTIFF'S EXHIBIT LIST

Pursuant to the Court's October 23, 2007 Scheduling Order (Doc. No. 13), Plaintiff Salzgitter Mannesmann International (USA) Inc. ("Salzgitter") submits the following list the exhibits it intends to use during the trial of this matter.

1. Invoice No. 24446 dated December 15, 2006 in the amount of \$80,848.35 relating to Purchase Order No. 012306-1.
2. Invoice No. 24605 dated December 29, 2006 in the amount of \$91,098.82 relating to Purchase Order No. 1414.
3. Invoice No. 24646 dated January 5, 2007 in the amount of \$328,271.23 relating to Purchase Order No. 1414.

4. Invoice No. 24648 dated January 5, 2007 in the amount of \$147,864.17 relating to Purchase Order No. 1496.

5. Invoice No. 24677 dated January 12, 2007 in the amount of \$77,613.83 relating to Purchase Order No. 1496.

6. Invoice No. 24840 dated February 8, 2007 in the amount of \$15,146.73 relating to Purchase Order No. 1414.

7. Invoice No. 25501 dated April 30, 2007 in the amount of \$10,148.97 relating to Purchase Order No. sd-12306.

8. Invoice No. 25549 dated May 8, 2007 in the amount of \$16,238.88 relating to Purchase Order No. 1496.

9. Invoice No. DN24764 dated January 29, 2007 in the amount of \$4,590.32 relating to Purchase Order No. 1357.

10. Email to Scott Dowdell from Rolf Mainz dated July 13, 2004 concerning future purchases (SALZ 01-00002).

11. Email to Scott Dowdell from Rolf Mainz dated March 3, 2004 relating to Purchase Order No. sd-028024-1 (SALZ 01-00011- through 01-00012).

12. Email to Eckhard Holzhausen from Rolf Mainz dated sd-028024-1 August 2, 2004 (SALZ 01-00021).

13. Purchase Order No. sd-0280204 dated August 2, 2004 (SALZ 01-00024).

14. Final Purchase Order sd-0280204 dated August 5, 2004 (SALZ 01-00018).

15. Written Order Confirmation for Purchase Order sd-0280204 dated August 24, 2004 (SALZ 01-00038).

16. Email to Mike Saltarelli from Rolf Mainz dated September 22, 2004 sd-028024-1 (SALZ 01-00037).

17. Facsimile to Rolf Mainz and Mike Saltarelli from Scott Dowdell dated January 7, 2005 attaching documentation concerning warehouse storage dispute (SALZ 01-00058 through 01- 00061).

18. Email to Thorsten Fittkau from Mike Saltarelli dated December 3, 2004 forwarding Scott Dowdell email from December 3, 2004 (SALZ 01-00051).

19. Email to Rolf Mainz from Scott Dowdell dated December 29, 2004 sd-028024-1 (SALZ 01-00064).

20. Email to Scott Dowdell from Mike Salterelli dated October 14, 2004 sd-028024-1 (SALZ 01-00030).

21. Email to Rolf Mainz from Scott Dowdell dated October 21, 2004 transmitting new Purchase Order No. sd-102104-1 (SALZ 02-00037 through 02-00038).

22. Email to Eckhard Holzhausen from Mike Salterelli dated October 22, 2004 transmitting revised Purchase Order No. sd-102104-1 (SALZ 02-00033 through 02-00034).

23. Revised Purchase Order No. 102104-1 dated October 22, 2004 (SALZ 02-00028).

24. Email to Eckhard Holzhausen from Mike Salterelli dated November 17, 2004 concerning SE Stud request to cancel and increase certain gauge items on Purchase Order No. sd-102104-1 (SALZ 02-00018).

25. Email to Scott Dowdell from Mike Salterelli dated November 19, 2004 concerning request to increase certain gauge items relating to Purchase Order No. sd-102104-1 (SALZ 02-00016 through 02-00017).

26. Email to Mike Salterelli from Eckhard Holzhausen dated November 24, 2004 attaching revised calculation sheets on remaining items for SE Stud Purchase Order No. sd-102104-1 (SALZ 02-00011 through 02-00014).

27. Written Order Confirmation for Purchase Order No. sd-04509 (previously sd-102104-1) dated December 8, 2004 (SALZ 02-00004).

28. Email to Rolf Mainz from Scott Dowdell dated December 14, 2004 attaching copy of revised order and agreeing to terms of Purchase Order No. sd-102104-1 (SALZ 02-00026 through 02-00027).

29. Email to Thorsten Fittkau from Mike Salterelli forwarding email from Scott Dowdell dated December 14, 2004 for firm bid proposal for Purchase Order No. sc-122204-01 (SALZ 03-00029).

30. Email to Rolf Mainz and Eckhard Halzhausen from Mike Salterelli dated December 17, 2004 forwarding email exchange with Scott Dowdell concerning counter-offer (SALZ 03-00027 through 03-00028).

31. Email to Scott Dowdell from Mike Salterelli dated December 20, 2004 relating to Purchase Order No. sc-122204-01 (SALZ 03-00025).

32. Email to Scott Dowdell from Mike Salterelli dated December 21, 2004 relating to Purchase Order No. sc-122204-01 (SALZ 03-00022).

33. Purchase Order No. sd-122204-01 (SALZ 03-00011).

34. Email to Scott Dowdell from Rolf Mainz dated December 28, 2004 relating to Purchase Order No. sd-122204-01 (SALZ 03-00012).

35. Written Order Confirmation for Purchase Order No. sc-122204-01 (SALZ 03-00007).

36. Email to Scott Dowdell from Rolf Mainz dated February 25, 2005 relating to Purchase Order No. sc-122204-01 (SALZ 03-00004).

37. Email to Scott Dowdell from Mike Salterelli dated March 16, 2005 relating to Purchase Order No. sd-120905-1 (SALZ 04-00003).

38. Email to Scott Dowdell from Rolf Mainz dated December 9, 2005 relating to Purchase Order No. 121905-1 (SALZ 04-000026).

39. Email to Ekhard Holzhausen from Rolf Mainz dated December 8, 2005 relating to Purchase Order No. 120905-1 (SALZ 04-00028).

40. Email to Scott Dowdell from Rolf Mainz dated December 9, 2005 relating to Purchase Order No. sd-120905-1 (SALZ 04-00024).

41. Purchase Order No. sd-120905-1 (SALZ 04-00015).

42. Written Order Confirmation for Purchase Order No. sd-120905-1 (SALZ 04-00004).

43. Email to Scott Dowdell from Mike Saltarelli dated March 16, 2006 relating to Purchase Order No. 120905-1 (SALZ 04-00003).

44. Email to Rolf Mainz from Scott Dowdell dated January 16, 2005 relating to Purchase Order No. 012306 (SALZ 05-00066).

45. Email to Scott Dowdell from Rolf Mainz dated January 20, 2006 relating to Purchase Order No. 012306-1 (SALZ 05-00059).

46. Cost calculation spreadsheet for pricing of Purchase Order No. 012306-1 (SALZ 05-00057).

47. Email to Scott Dowdell from Rolf Mainz dated January 25, 2005 relating to negotiations of Purchase Order No. 012306 (SALZ 05-00045).

48. Purchase Order No. sd-012306-1 (also referenced as sd-12306 or 012306-1) dated January 24, 2006 (SALZ 05-00049).

49. Written Order Confirmation for Purchase Order No. sd-012306 dated February 6, 2006 (SALZ 05-00042).

50. Email to Rolf Mainz from Eckhard Holzhausen dated March 29, 2006 relating to Purchase Order No. 012306 (SALZ 05-00037).

51. Emails to Scott Dowdell from Rolf Mainz dated April 27, 2006 relating to Purchase Order No. 012306-1 (SALZ 05-00036).

52. Email to Rolf Mainz from Scott Dowdell dated April 27, 2006 relating to Purchase Order No. 012306-1 (SALZ 05-00033).

53. Email to Beatriz Grant and Mike Saltarelli from Scott Dowdell dated July 26, 2006 relating to Purchase Order No. 012306-1 (SALZ 05-00035).

54. Email to Beatriz Grant and Mike Saltarelli from Scott Dowdell dated July 26, 2006 relating to Purchase Order No. 012306-1 (SALZ 05-00034).

55. Email to Scott Dowdell from Rolf Mainz dated August 2, 2006 relating to Purchase Order No. 012306-1 (SALZ 05-00032).

56. Email to Rolf Mainz from Thorsten Fittkau dated August 31, 2006 relating to Purchase Order No. 012306-1 (SALZ 05-00022).

57. Email to Scott Dowdell from Rolf Mainz dated September 20, 2006 relating to Purchase Order No. 012306-1 (SALZ 05-00021).

58. Email Rolf Mainz from Scott Dowdell dated October 2, 2006 relating to Purchase Order No. 012306-1 (SALZ 05-00018).

59. Memorandum to Empire Stevedoring/Valerie Daussin with copy to Southeastern Stud from Saltzgitter dated October 25, 2006 relating to Purchase Order No. 012306-1 (SALZ 05-00014).

60. Email to Scott Dowdell from Rolf Mainz dated October 3, 2006 relating to Purchase Order No. 12306-1 (SALZ 05-00015).

61. Email to Scott Dowdell from Mary Frederick dated October 25, 2006 relating to Purchase Order No. 012306-1 (SALZ 05-00013).

62. Email to Scott Dowdell from Mike Saltarelli dated April 10, 2007 relating to Purchase Order No. 012306-1 (SALZ 05-00007 through 05-00008).

63. Email to Joe Silva from Rolf Mainz dated April 25, 2007 relating to Purchase Order No. 012306-1 (SALZ 05-00005).

64. Email to Scott Dowdell from Rolf Mainz dated April 26, 2007 relating to Purchase Order No. 012306-1 (SALZ 05-00004).

65. Email to Scott Dowdell from Rolf Mainz dated March 24, 2006 relating to Purchase Order No. 1357 (SALZ 06-00063).

66. Email to Scott Dowdell from Mike Saltarelli dated April 18, 2006 relating to Purchase Order No. 1357 (SALZ 06-00034).

67. Email to Scott Dowdell from Mike Saltarelli dated April 18, 2006 relating to Purchase Order No. 1357 (SALZ 06-00033).

68. Purchase Order No. 1357 dated April 16, 2006. (SALZ 06-00020).

69. Email to Scott Dowdell from Rolf Mainz dated April 19, 2006 relating to Purchase Order No. 1357 (SALZ 06-00028).

70. Email to Scott Dowdell from Rolf Mainz dated April 19, 2006 relating to Purchase Order No. 1357 (SALZ 06-00024 through 06-00025).

71. Email to Scott Dowdell from Rolf Mainz dated May 17, 2006 relating to Purchase Order No. 1357 (SALZ 06-00015).

72. Email to Scott Dowdell from Rolf Mainz dated May 23, 2006 relating to Purchase Order No. 1357 (SALZ 06-00012).

73. Email to Beatriz Grant, Lucila Guibu, Wally Nugent from Katja Gailun dated July 7, 2006 relating to Purchase Order No. 1357 (SALZ 06-00010).

74. Email to Scott Dowdell from Mike Saltarelli dated September 14, 2006 relating to Purchase Order No. 1357 (SALZ 06-00007).

75. Spreadsheet of M/V "AKILI" status (SALZ 06-00008).

76. Email to Scott Dowdell from Rolf Mainz dated September 20, 2006 relating to Purchase Order No. 1357 (SALZ 06-00005).

77. Email to Scott Dowdell from Rolf Mainz dated September 20, 2006 relating to SE Stud orders with Salzgitter (SALZ 06-00006).

78. Email to Rolf Mainz from Scott Dowdell dated September 21, 2006 relating to Purchase Order No. 1357 (SALZ 06-00001 through 06-00002).

79. Written Order Confirmation for Purchase Order No. 1357 dated May 4, 2006 (SALZ 06-00016).

80. Invoice 23647 dated September 12, 2006 referencing Purchase Order No. 1357 (S.E. Stud 000003).

81. Invoice No. 23647 dated September 12, 2006 referencing Purchase order No. 1357 with handwritten notes (S.E. Stud 000002).

82. Payment records of S.E. Stud reflecting payments made against Salzgitter Invoice 23647 (S.E. Stud 000004-12).

83. Email to Scott Dowdell from Rolf Mainz dated May 3, 2006 relating to issues in advance of Purchase Order No. 1414 (SALZ 07-00052).

84. Email to Scott Dowdell from Rolf Mainz dated May 5, 2006 relating to issues in advance of final Purchase Order No. 1414 (SALZ 07-00049).

85. Email to Scott Dowdell from Rolf Mainz dated May 9, 2006 relating to Purchase Order No. 1414 (SALZ 07-00044).

86. Purchase Order No. 1414 dated May 11, 2006 (SALZ 07-00043).

87. Email to Scott Dowdell from Rolf Mainz dated May 15, 2007 relating to Purchase Order No. 1414 (SALZ 07-00035 through 07-00036).

88. Email to Anna Huynh from Rolf Mainz dated May 19, 2006 revising S.E. Stud purchase relating to Purchase Order No. 1414 (SALZ 07-00031).

89. Revised Purchase Order No. 1414 dated May 23, 2006 (SALZ 07-00042).

90. Email to Rolf Mainz from Scott Dowdell dated June 30, 2006 relating to Purchase Order No. 1414 (SALZ 07-00022).

91. Email to Scott Dowdell from Rolf Mainz dated June 30, 2006 relating to Purchase Order No. 1414 (SALZ 07-00023).

92. Written Order Confirmation for purchase Order No. 1414 dated May 23, 2006 (SALZ 07-00027).

93. Email to Scott Dowdell from Rolf Mainz dated July 31, 2006 relating to Purchase Order No. 1414 (SALZ 07-00019).

94. Email to Thorsten Fittkau from Mike Saltarelli dated September 19, 2006 relating to Purchase Order No. 1414 (SALZ 07-00018).

95. Email to Joe Silva from Beatriz Grant dated September 21, 2006 relating to Purchase Order No. 1414 (SALZ 07-00014).

96. Email to Scott Dowdell from Rolf Mainz dated September 21, 2006 relating to Purchase Order No. 1414 (SALZ 07-00013).

97. Email to Joe Silva from Rolf Mainz dated December 21, 2006 relating to Purchase Order No. 1414 (SALZ 07-00012).

98. Memorandum to Empire Stevedoring/Valerie Daussin/Don from Mary Frederick with copy to SE Stud dated December 21, 2006 relating to release of materials relating to Purchase Order No. 1414 (SALZ 00011).

99. Memorandum to Empire Stevedoring/Valerie Daussin/Don from Mary Frederick with copy to SE Stud dated February 2, 2007 relating to release of materials relating to Purchase Order No. 1414 (SALZ 00008).

100. Purchase Order dated July 20, 2007 to Steelsalvor LLC on behalf of Salzgitter Mannesmann International (USA) Inc. to purchase steel – Reference No. 2147 (SALZ 07-00003 through 07-00004).

101. Purchase Order dated July 27, 2007 to Steelsalvor LLC on behalf of Salzgitter Mannesmann International (USA) Inc. to purchase steel – Reference No. 2147B (SALZ 07-00006 through 07-00007).

102. Memorandum to Empire Stevedoring/Valerie Daussin/Don from Mary Frederick with copy to SE Stud dated July 27, 2007 relating to release of materials relating to Purchase Order No. 1414 (SALZ 07- 00001).

103. Email to Scott Dowdell from Mike Saltarelli dated June 30, 2006 relating to Purchase Order No. 1496 (SALZ 08-00061).

104. Email to Thorsten Fittkau from Rolf Mainz dated July 6, 2006 relating to Purchase Order No. 1496 (SALZ 08-00058 through 08-00059).

105. Email to Scott Dowdell from Rolf Mainz dated July 10, 2006 relating to Purchase Order No. 1496 (SALZ 08-00057).

106. Purchase Order No. 1496 dated July 13, 2006 (SALZ 08-00034).

107. Written Order Confirmation for Purchase Order No. 1496 dated August 15, 2006 (SALZ 08-00022).

108. Email to Rolf Mainz from Thorsten Fittkau dated September 20, 2006 relating to Purchase Order No. 1496 (SALZ 08-00018).

109. Email to Rolf Mainz from Scott Dowdell dated September 19, 2006 relating to Purchase Order No. 1496 (SALZ 08-00021).

110. Email to Thorsten Fittkau and Mike Saltarelli from Rolf Mainz dated September 20, 2006 relating to Purchase Order No. 1496 (SALZ 08-00019 through 08-00020).

111. Memorandum to Pacorini USA, Inc./Tony Dow/Earl Peyton from Mary Frederick with copy to SE Stud dated December 21, 2006 relating to release of materials relating to Purchase Order No. 1456 (SALZ 08-00027)

112. Memorandum with handwritten notes to Pacorini USA, Inc./Tony Dow/Earl Peyton from Mary Frederick with copy to SE Stud dated December 21, 2006 relating to release of materials relating to Purchase Order No. 1456 (SALZ 08-00013)

113. Memorandum to Pacorini USA, Inc./Tony Dow/Earl Peyton from Mary Frederick with copy to SE Stud dated January 3, 2007 relating to release of materials relating to Purchase Order No. 1456 (SALZ 08-00010).

114. Written Order Confirmation for Purchase Order No. 1496 dated January 3, 2007 (SALZ 08-00008 through 08-00009).

115. Invoice No. 12953 dated April 26, 2007 relating to Purchase Order No. 1496 (SALZ 08-00007).

116. Purchase Order dated July 23, 2007 to Steelsalvor LLC on behalf of Salzgitter Mannesmann International (USA) Inc. to purchase steel – Reference No. 2147B (SALZ 08-00005 through 08-00006).

117. Purchase Order dated August 23, 2007 to Steelsalvor LLC on behalf of Salzgitter Mannesmann International (USA) Inc. to purchase steel – Reference No. 2147D (SALZ 08-00002 through 08-00003).

118. Email to Scott Shapiro from Rolf Mainz dated August 22, 2007 relating to Purchase Order No. 1496 (SALZ 08-00001).

119. Memorandum to Empire Stevedoring/Valerie Daussin/Don from Mary Frederick with copy to SE Stud dated December 21, 2006 relating to release of materials relating to Purchase Order No. 1414 which contains handwritten notes (S.E. Stud 000168).

120. Invoice No. 24605 dated December 29, 2006 referencing Purchase Order No. 1414 (S.E. Stud 000135).

121. Invoice No. 24646 dated January 5, 2007 referencing Purchase Order No. 1414 (S.E. Stud 000161).

122. Payment records referencing Invoice Nos. 24605 and 246602 (S.E. Stud 000160).

123 Invoice No. 24840 dated February 8, 2007 referencing Purchase Order No. 1414 (S.E. Stud 000130).

124. Invoice No. 24677 dated January 12, 2007 referencing Purchase Order No. 1496.

125. Memorandum to Empire Stevedoring/Valerie Daussin/Don from Mary Frederick with copy to SE Stud dated December 21, 2006 relating to release of materials relating to Purchase Order No. 1496 which contains handwritten notes (S.E. Stud 000230).

126. Documentation reflecting Salzgitter's release of materials off the "TOP RICH" (S.E. Stud 000221 through 000225).

127. Invoice No. 24677 dated January 12, 2007 referencing Purchase Order NO. 1496. (S.E. Stud 000206).

128. Defendant's Response to Plaintiff's Interrogatories to Defendant.

129. Defendant's Response to Plaintiff's Requests for Admission to Defendant.

130. Defendant's Response to Plaintiff's Requests for Production.

131. Documents relating to attorney fees for Plaintiff.

132. Documents produced by Plaintiff.

133. Documents produced by Defendant.

134. Any exhibit identified by Defendant.

135. Any exhibit needed for rebuttal.

s/ J. Forrest Hinton

J. FORREST HINTON

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of May, 2008, the foregoing was served by electronic mail via the Court's CM/ECF system on the following:

James L. Day
Von G. Memory
469 South McDonough Street
Montgomery, Alabama 36103-4054
Telephone (334) 834-8000
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s/ J. Forrest Hinton
Of Counsel